



To: NTSB
Department of Transportation

From: Bernard Raysor
Director of Aviation Operations
Arkansas Children's Hospital
FAA Air carrier Cert. # Z1RA654Y

Date: 3-10-05

Subject: Comments on proposed Rule Change to CFR 49 part 830
requiring comment before 3-11- 2005.

This appears to be a systems problem involving data collection for what I assume will be to some extent utilized for trend analysis and recommendation development. I recommend utilizing systems currently in place; rather than creating a new system or significantly changing a current rule resulting in numerous over arching negative impacts to the entire industry.

1. This information is already available under the FAA system for Mechanical Reliability reports (FAR 135.415) now called Service Difficulty reports (FAR 135.415 & .416) and Mechanical Interruption summary reports (FAA 135.417). In fact the HAI MMIR system is a more than adequate system and I suggest that the NTSB take a look at this collection mechanism.
2. Re- classifying what constitutes substantial damage/accidents will categorically change the current pool of statistical data used to determine Accident rates. This system of metrics is used through out the industry for a multitude of reasons from aircraft insurance rates to institutional purchase decisions.
3. Insurance rates will more than likely be negatively impacted. This is a revenue/bottom line issue.
4. The overall potential for serious revenue declines is very real. A few of the reasons are listed below:

- A. Time delays: Out of service times will be greatly increased due to waiting on a NTSB release after an “**Incident**” associated with an already under staffed NTSB. If the NTSB determines a investigation is warranted for what is now an “**Incident**” a catastrophic loss of revenue will result for that airframe. In the Air medical business that loss of revenue equates to a “**Loss of Life**”.
- B. Insurance rates for individual operators and the overall industry would likely increase.
- C. Operators accident history would be negatively impacted; in some cases preventing eligibility to bid on certain contracts.
- D. Individual pilots accident records would be negatively impacted resulting in possible loss of income.